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adds value to business,
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Contractor Oversight Inside and Outside of VPP

16th Annual Safety Professional Development
Conference

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Office of Partnerships and Recognition

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Contractor Oversight – Common Traits

Good contractor oversight will normally coincide with a good safety and health management system (SHMS)

- Senior management support
- Strong safety and health contract language
- Established prequalification standards
- Required jobsite safety and health training and orientation
- Formal inspection program of contractor operations
- Punitive actions for noncompliance with S&H provisions

Contractor Oversight – SHMS

Indicators of good SHMS

- Owners/Host & General Contractors accept responsibility for safety for all employees working at sites under their control
- Hazard tracking includes those created by their contractors
- Strong programs for employee involvement will often include contractor employees
- High level of employee awareness of site S&H policies, hazards, tasks etc.

Contractor Oversight – Management Support

Senior Management Support

- Ensures adequate funding for S&H
- Leads by example
- Supports the company's safety and health management system
- Site visits
- Accident/incident review
- Participation in company safety functions

Contractor Oversight – Contracts

Strong S&H Contract Language

- Will usually have contractor/subcontractor language that outlines requirements of S&H compliance with laws, defines S&H roles, responsibilities etc.
- May establish lines of communication
- Spells out job specific safety and health requirements, like safety and health program submittal, Chemical Information lists, MSDSs, etc.
- Establish penalties for non compliance

Contractor Oversight – Prequalification

Established prequalification standards

- Written S&H program review
- OSHA 300 log history review
- OSHA citation history
- Insurance EMR
- Can they get a bond
- Certificates of Insurance
- References

Contractor Oversight – Training

Required jobsite safety and health training and orientation

- Require minimum training for contractor employees
- Provide orientation for all new employees or employees that have been away from the job for extended period
- Sharing of information and training from lessons learned resulting from site accidents
- Invite contractors to conduct training
- Pre-task/Pre-use training
- Require that training records be kept on file

Contractor Oversight – Common Traits

Site Inspections

- Establish a formal inspection program for contractor operations
- Require a rigorous safety and health inspection program by the contractor
- Require documentation as often as necessary but no less than once a week for construction for example

Contractor Oversight – Penalties

Punitive actions for noncompliance with S&H provisions

- Contractor disciplinary policy
 - Covers contractor employees
- Should include monetary penalty for non compliance
 - Severe infractions could include removal from site and loss of contract
- Don't be afraid to enforce

VPP Policy & Procedures Manual

- Contract workers must be provided with safety and health protection equal in quality to that provided to employees.
- All contractors, whether regularly involved in routine site operations or engaged in temporary projects such as construction or repair, must follow the safety and health rules of the host site.
- VPP participants must have in place a documented oversight and management system covering applicable contractors. Such a system must:
- Ensure that safety and health considerations are addressed during the process of selecting contractors and when contractors are onsite.
- Encourage contractors to develop and operate effective safety and health management systems

VPP Policy & Procedures Manual

- Include provisions for timely identification, correction, and tracking of uncontrolled hazards in contractor work areas.
- Include a provision for removing a contractor or contractor's employees from the site for safety or health violations. **Injury and Illness Data Requirements**
- Nested contractors (such as contracted maintenance workers) and temporary employees who are supervised by host site management are governed by the site's safety and health management system and are therefore included in the host site's rates.
- Site management must maintain copies of the TCIR and DART rate data for all applicable contractors based on hours worked at the site. (App A-1,000 hrs/qtr)
- Sites must report all applicable contractors' TCIR and DART rate data to OSHA annually.

VPP STATISTICS

	Federal	State
Participants	<ul style="list-style-type: none">• Total: 1,291<ul style="list-style-type: none">✓ Star 1,226✓ Merit 50✓ Demo 15	<ul style="list-style-type: none">• Total: 509<ul style="list-style-type: none">✓ Star 491✓ Merit 18
Union	<ul style="list-style-type: none">• 378 (29%)	<ul style="list-style-type: none">• 30 (6%)
Non-Union	<ul style="list-style-type: none">• 913 (71%)	<ul style="list-style-type: none">• 479 (94%)
Employees	<ul style="list-style-type: none">• 493,147	<ul style="list-style-type: none">• 196,057
Contractors	<ul style="list-style-type: none">• 86,182	<ul style="list-style-type: none">• 7,618

As of 7/30/07



VPP Navy Shipyard Results

	Portsmouth	Norfolk	Puget Sound
Employees	4,070	8,345	11,000
TCIR Compared to Industry Average	-33%	-57%	-42%
Workers' Comp Savings	\$600,770	\$1,036,834	\$367,898

OSHA's Voluntary Protection Program



1982 **25** 2007

YEARS

Information Sources - VPP



- www.osha.gov/dcsp/vpp
- www.osha.gov/dcsp/alliances/acc/acc.html
- OSHA National Office
Office of Partnerships and Recognition (202)
693-2213
- Regional OSHA VPP Manager

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